

1 Kurt A. Kappes (SBN 146384)
2 Ashley Farrell Pickett (SBN 271825)
3 Bryan W. Patton (SBN 294910)
4 **GREENBERG TRAURIG, LLP**
5 1840 Century Park East, Suite 1900
6 Los Angeles, CA 90067-2121
7 Email: kappesk@gtlaw.com
8 farrellpicketta@gtlaw.com
9 pattonbw@gtlaw.com
10 TEL: 310-586-7700
11 FAX: 310-586-7800
12 Attorneys for Defendant
13 PRO UNLIMITED, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FRANCISCO RODRIGUEZ, on behalf of
himself and all others similarly situated,

Plaintiff,

V.

TWITTER, INC. and PRO UNLIMITED, INC.,

Defendants.

CASE NO. 4:22-cv-7222-DMR

Assigned to The Honorable Donna M. Ryu

**JOINT STIPULATION TO EXTEND
DEFENDANTS' TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

1 WHEREAS, Plaintiff Francisco Rodriguez filed his Complaint on November 16, 2022;

2 WHEREAS, Defendants Pro Unlimited, Inc. and Twitter, Inc. have requested and Plaintiff has
3 consented to extend Defendants' deadline to respond to Plaintiff's Complaint until December 27, 2022;

4 WHEREAS, Defendants have agreed that they will not solicit releases from putative class
5 members as defined by Plaintiff in the Complaint [dkt. 1] until January 11, 2023;

6 WHEREAS, the extension of Defendants' deadline to respond to Plaintiff's Complaint until
7 December 27, 2022 will not alter the date of any event or deadline already fixed by Court order;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties and their
9 respective counsel, that Defendants shall respond to Plaintiff's Complaint by December 27, 2022.

10
11 Dated: December 12, 2022 LICHTERN & LISS-RIORDAN, P.C.

12
13 By: /s/ Shannon Liss-Riordan
14 Shannon Liss-Riordan
15 Attorneys for Plaintiff
16 FRANCISCO RODRIGUEZ

17
18 Dated: December 12, 2022 MORGAN, LEWIS & BOCKIUS LLP

19
20 By: /s/ Eric Meckley
21 Eric Meckley
22 Attorneys for Defendant
23 TWITTER, INC.

24
25 Dated: December 12, 2022 GREENBERG TRAURIG, LLP

26
27 By: /s/ Ashley Farrell Pickett
28 Ashley Farrell Pickett
Attorneys for Defendant
PRO UNLIMITED, INC.

FILER ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that the concurrence in the filing of this document has been obtained from the stipulating parties.

Dated: December 12, 2022

GREENBERG TRAURIG, LLP

By: /s/ Ashley Farrell Pickett

Ashley Farrell Pickett

Attorneys for Defendant

PRO UNLIMITED, INC.